



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

September 25, 2008

Mr. Mark Durno, Section Chief
United States Environmental Protection Agency
9311 Groh Road
Grosse Ile, Michigan 48138

Dear Mr. Durno:

SUBJECT: Referral for Removal Action – Reclamation Oil Site
6472 Selkirk Street, Detroit, Wayne County, Michigan

This letter is to formally acknowledge the Department of Environmental Quality's referral of the above referenced site for the United States Environmental Protection Agency's assistance. Please find the enclosed Briefing Paper detailing the history of the site.

If you have any questions regarding this matter, please contact me.

Sincerely,

Oladipo Oyinsan, District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3800

Enclosure

cc: Mr. Philip L. Schrantz, DEQ
Mr. Paul Owens, DEQ
Mr. Jeff Lippert, DEQ

BRIEFING PAPER
U.S. ENVIRONMENTAL PROTECTION AGENCY REFERRAL
RECLAMATION OIL, DETROIT, MICHIGAN

Issue or Request:

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), Southeast MI District office is hereby requesting that the Reclamation Oil Site be referred to United States Environmental Protection Agency (U.S. EPA) to address potential acute health hazards associated with environmental contamination present at or near the ground surface.

Background/Facts:

Reclamation Oil
6472 Selkirk Street
Detroit, Wayne County
MDEQ Project #453027

Reclamation Oil (Site) operated as a chemical manufacturing, storage, and distribution facility from the 1920s through the mid-1990s. The site is currently mostly vacant: only one building (former warehouse) and a concrete truck well/loading dock still remain on the property. The site is a 200 feet x 200 feet (approximately one acre) partially fenced vacant lot. The remainder of the site is mostly covered with gravel/soil fill material, some concrete pavement, and concrete floor slabs and footers. The site is surrounded by commercial and industrial properties to the north and west, and residential homes to the east and southwest.

Historical records indicate that the site operated as a turpentine and resin storage facility in the 1920s and 1930s. From the 1930s until the 1960s, the site was operated as a storage and distribution facility for various solvents, chlorinated and non-chlorinated. In April 1976, Mr. Morris Sheikh, president of Reclamation Company, Incorporated, purchased the site from Western Eaton Solvents and Chemicals, subsequently known as ChemCentral Corporation. Reclamation Company, Incorporated, used the site as an oil reclamation facility. Mr. Sheikh's wife was added to the title in 1977, and is the current owner.

A confirmed release was reported to the Michigan State Police Fire Marshall Division by the Reclamation Company, Incorporated, on July 7, 1993. The report indicated that a release was reported due to the presence of elevated concentrations of chlorinated and petroleum solvents in samples of liquids from the underground storage tanks (USTs) and water that infiltrated the basement of the former office building. The file indicated that there were 52 known USTs and at least 22 aboveground storage tanks (ASTs) which contained chlorinated solvents. Records indicated that the tanks had never been registered as required under state and federal statutes. Also in 1993, an alleged act of vandalism resulted in a surface release of waste oil from several ASTs.

In 1998, the Department of Environmental Quality (DEQ) issued a formal notice to ChemCentral Corporation that indicated it was a previous owner and operator of the site responsible for "undertaking the necessary corrective activities" in accordance with Part

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213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. A similar notification was sent to Mr. Sheikh. Subsequently, the DEQ was granted access and requested assistance from the United States Environmental Protection Agency (U.S. EPA) in controlling hazardous conditions at the site.

In 1997, Malcolm Pirnie, Incorporated (MPI) was contracted by the state to conduct site restoration activities as outlined in the October 1997, Proposal for Project Management Services of Sites of Environmental Contamination. The object of the work plan was to address the activities necessary to be completed prior to initiating the removal or abandonment of the above ground storage tanks (ASTs) and underground storage tanks (USTs), (i.e. conduct tank/drum inventory, limited soil and groundwater evaluation, and repair perimeter fence). The proposed activities included pre-abatement activities, abatement activities, and corrective/remedial action activities. Even though MPI conducted preliminary site visits, and some pre-abatement efforts, due to the extensive wastes remaining on-site and the potentially elevated level of environmental impact, it was determined that the site should be referred to U.S. EPA to address eminent public health and safety hazards.

In April 1999, USEPA initiated a limited site investigation which identified numerous ASTs, USTs, and drums at the site. In 2000, U.S. EPA completed a time-critical removal of the ASTs, USTs, and drums to address the threat to public health posed by the presence of hazardous materials. Approximately 56 ASTs, 32 USTs, 850 55-gallon drums, 200 five-gallon containers, more than 500 small containers, and 300 bags were removed from the site as part of the removal action. Contaminated soils, groundwater (not in an aquifer), storm drain sediments, and precipitation contamination were not addressed and still remain at the site.

After U.S. EPA's initial removal efforts, the DEQ conducted an extensive soil investigation, collecting over 70 soil, groundwater, storm drain water, storm drain sediments, and precipitant samples and outlined the findings in the Site Investigation Report dated February 2006. The data indicated that surface soils (within zero to five feet below ground surface <bgs>) across the site are impacted with levels of volatile organic compounds (VOCs) above Csat Criteria, semi-volatile organic compounds (SVOCs) above Direct Contact Criteria, polychlorinated biphenyls (PCBs) above Direct Contact Criteria, and metals (chromium and lead) in excess of Particulate Soil Inhalation Criteria. Groundwater was encountered at one to six-feet bgs, appears to be perched, and is contaminated with VOCs, SVOCs and metals at levels that exceed Drinking Water Criteria. Precipitant staining is observed on the sidewalk and on the soils in the unpaved portion of the right-of-way along the southern side of the property. Contaminated storm water and sediments (arsenic and lead) have accumulated in the on-site storm drains. The numerous Direct Contact Criteria exceedances are a particular concern because the Site borders a residential neighborhood to the east and is has proven difficult to reliably secure. Past attempts to fence the site have not been effective as fence material has been repeatedly stolen.

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The DEQ had contracted MACTEC Engineering and Consulting, Incorporated, which has completed a Feasibility Study for the Site. The Study recommends excavation of the entire Site down to five feet and backfill with clean fill.

Analysis

A total of \$500,000 of Refined Petroleum Funds was authorized for this site on January 24, 2008. Of this original amount, \$272,547.00 is left to conduct remedial activities. It is estimated that the total cost to remediate the site is \$1,710,000.00, leaving a shortfall of \$1,437,453.00. The future availability of state funds is uncertain at this time.

The U.S. EPA has expressed interest in working on sites with significant environmental and human health risks in which the State of Michigan has a shortfall of funding to address.

Recommendation

The DEQ, RRD, Southeast Michigan District Office, recommends that this site be referred to the U.S. EPA for appropriate remedial response actions.

Prepared by: Jeff Lippert, Project Manager
Remediation and Redevelopment Division
Southeast Michigan District Office
Michigan Department of Environmental Quality
August 28, 2008

Approvals

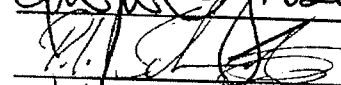
District Supervisor:



Date

9/9/08

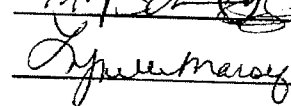
Field Operations Section Chief:



Date

9.16.2008

Division Chief:



Date

9/16/08